



March 4, 2008

**By ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: EB Docket No. 06-36 - CPNI Certification for 2007  
Vizada, Inc. and Marlink, Inc.**

Dear Ms. Dortch:

Vizada, Inc. ("Vizada") and Marlink, Inc. ("Marlink") hereby submit the attached CPNI certifications.

A statement of the operating procedures used by Vizada and Marlink to ensure compliance with the Commission's Rules regarding the use of Customer Proprietary Network Information is also included.

A copy of this filing has been submitted to the Commission's contract copier as well. Please contact the undersigned at 301-838-7807 with any questions about this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert W. Swanson'.

Robert W. Swanson  
Associate Counsel

cc: Marcy Greene ([marcy.greene@fcc.gov](mailto:marcy.greene@fcc.gov))  
Best Copy and Printing, Inc. ([fcc@bcpiweb.com](mailto:fcc@bcpiweb.com))

Signed /s/ Robert M. Baker

## **STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES**

**This compliance statement applies to Vizada, Inc. and Marlink, Inc. (collectively referred to herein as the "Company")**

The Company's operating procedures ensure compliance with the Communications Act of 1934 (as amended) and FCC Rules regarding the use of CPNI. Our Company policy clearly states that the use, disclosure of, or permitting access to our customers' CPNI is strictly prohibited absent the requisite customer approval, except as required by law, or under the exceptions set forth at 47 U.S.C. § 222 and 47 C.F.R. §§ 64.2001 *et seq.*

### **Definition of CPNI**

Our Company policy defines CPNI as follows:

"CPNI is generally defined as any information about a customer that a communications carrier receives by virtue of its provision of telecommunications service to the customer. It includes not only subscriber information provided by the customer, but also billing records, call history, patterns of use, and other types of information that are derived from the customer's use of the carrier's services."

### **Restrictions on the Use of CPNI and Permissible Uses**

As stated above, the Company's use of CPNI is restricted, as required by statute and the FCC's Rules. Employee access to CPNI is limited, and employees are instructed that the use or disclosure of CPNI to individuals inside or outside of the company is strictly prohibited except as required by law (*e.g.* a lawful law enforcement subpoena) or as provided in exceptions set forth at 47 U.S.C. § 222 or 47 C.F.R. § 2005 (*e.g.* for billing purposes).

### **CPNI Notifications**

The Company does not use CPNI for marketing purposes and thus has not implemented either "opt-in" or "opt-out" CPNI approval procedures. Because of this limited use of CPNI, the Company has not implemented the applicable CPNI notification requirements as set forth in the Commission's Rules at 47 C.F.R. § 64.2008. If the Company in the future decides to change its use of CPNI, it will first notify customers of their CPNI rights as required by 47 C.F.R. § 64.2008.

### **Breaches of Data Security**

In accordance with 47 C.F.R. § 2011 (a), the Company will notify the United States Secret Service and the Federal Bureau of Investigation via the online Data Breach Reporting Portal in the event of a data breach. Unless law enforcement directs otherwise, the Company will notify the affected customers after the expiration of the seven (7) day waiting period. In accordance with 47 C.F.R. § 2011 (d), the Company will maintain a record of any breaches discovered, notifications made to law enforcement, and notifications made to customers for at least two (2) years.

### **CPNI Compliance Review**

The Company's legal department reviews uses of CPNI and ensures compliance with the Communications Act of 1934 and the FCC's Rules regarding CPNI. Employees are advised to direct any questions regarding the use of CPNI to the legal department.

### **Disciplinary Procedures**

The Company has informed employees that it considers compliance with the Communications Act of 1934 and the FCC's Rules regarding the use, disclosure, and access to CPNI to be of utmost importance. Employees have been advised that violations of the Company's CPNI policy will lead to strong disciplinary action.